

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**  
**DOCKET NO. 2020-125-E**

IN RE:	)	<b><u>DEPARTMENT OF CONSUMER</u></b>
	)	<b><u>AFFAIRS' SECOND SET OF</u></b>
Application of Dominion Energy	)	<b><u>DISCOVERY REQUESTS TO</u></b>
South Carolina, Inc. for	)	<b><u>DOMINION ENERGY SOUTH</u></b>
Adjustment of Rates and Charges	)	<b><u>CAROLINA, INC.</u></b>
	)	
	)	

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Pursuant to S.C. Code Ann. Regs. 103-833, the South Carolina Department of Consumer Affairs ("Department"), by and through its undersigned counsel, hereby submits this Second Set of Discovery Requests to Dominion Energy South Carolina, Inc. ("DESC"). Pursuant to South Carolina Rules of Civil Procedure and Commission Regulations, each request is continuing until the time of the hearing such that DESC must promptly transmit to the Department the requested information as it becomes available. Please forward to the undersigned, via email, your first iteration of responses to the following request within 20 days of service.

**Instructions**

1. Responses to these requests should be provided within 20 days of this request in writing and under oath to the email addresses listed below.
2. You are under a duty to supplement any response to this request for production for which you learn that the response is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to us during the discovery process or in writing.
3. For any document withheld under a claim of privilege, submit a sworn or certified statement from your counsel or one of your employees in which you identify the document by author, addressee, date, number of pages, and subject matter; specify the nature and basis of the claimed privilege and the paragraph of this demand for documents to which the document is

responsive; and identify each person to whom the document or its contents, or any part thereof, has been disclosed.

### **Definitions**

1. “Application” is defined as the application filed by Dominion Energy South Carolina, Inc. on August 14, 2020 or as otherwise revised.
2. “Company” and “DESC” are defined as Dominion Energy South Carolina, Inc., its parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.
3. “Workpapers” and “documents” are defined in the most broadest terms and should not be construed as limited to the listed examples, or limited only to items that are currently within your control or custody; include each and every original or copy of words or information generated by printing, typing, longhand, electronic recording, or other process, regardless of the form thereof, and include any kind of writing. Such documents include, but are not limited to, published materials, reports, correspondence, emails, records, memoranda, notices, notes, marginal notations, messages, teletype printouts, statements, books, studies, minutes, diagrams, drawings, maps, surveys, plans, charts, graphs, data, computer files, billings, evaluations, photographs, audio tapes, and videotapes.

### **Document and Information Requests**

- 2-1.** For the purposes of this request, please refer to the Rebuttal Testimony of Kevin R. Kochems at page 5, lines 1 through 7, where he states:

Mr. Dismukes’ direct testimony does not provide a full recitation of FERC’s position on the employment of alternative methodologies, like the one employed by the Company here. Indeed, FERC advises that while it may favor the 12-monthly coincident peak (“12-CP”) cost allocation method for transmission costs, utilities are free to employ alternative allocation methodologies that reflect transmission planning, such as planning their systems to meet an annual peak, as done by the Company in this proceeding.

- a. Please provide the cost allocation method utilized by the Dominion Energy South Carolina (“DESC”) and its predecessor in determining rates included in its Open Access Transmission Tariff (“OATT”) for each of the past five years.

- b. Please provide a direct reference to all FERC docketed proceeding where OATT for DESC and its predecessor were approved in the past five years.
- c. Please provide the requested documents in electronic form with all spreadsheet links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

**2-2.** For the purposes of this request, please refer to the Direct Testimony of Kevin R. Kochems, Exhibit KRK-1, and the Company's response to ORS 2-40.

- a. Please reconcile the following allocation factors presented in response to ORS 2-40 with those used in Exhibit KRK-1:
  - i. RSL – “Direct Assignment – Sales Revenue”
  - ii. XCG – “Direct Assignment – Customer Growth”
- b. For each allocation factor listed in response to (a), please provide a detailed narrative explaining why the percentage allocations used by Mr. Kochems in Exhibit KRK-1 do not match the percentage allocations provided in response to ORS 2-40.
- c. Please provide the following allocation factors, including a short description of the allocation factor, that were omitted from the Company's response to ORS 2-40:
  - i. E904
  - ii. REV\_456WH
  - iii. Z500
  - iv. Z517
  - v. Z535
  - vi. Z541
  - vii. Z546
  - viii. Z551
  - ix. Z560
  - x. Z568
  - xi. Z580
  - xii. Z590
  - xiii. Z901
  - xiv. 903DA
  - xv. Z907
  - xvi. CUSZZ
- d. Please provide the requested documents in electronic form with all spreadsheet links and formulas intact, source data used, and explain all assumptions and calculations used. To the

extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

- 2-3. For the purposes of this request, please refer to the Direct Testimony of Allen W. Rooks, Exhibit AWR-1, and the Exhibit C-2 attached to the Company's Application.
- a. Confirm that the column titled "Current Annualized Revenue" included in Exhibit AWR-1 attached to the Direct Testimony of Allen W. Rooks represents annualized retail rate revenues as of May 2020.
  - b. Confirm that row 1 titled "Operating Revenues" on page 2 of Exhibit C-2 represent annualized retail rate revenues as of December 31, 2019.
  - c. Please reconcile the Company's current annualized retail revenues of \$2,155,389,339 presented in Exhibit AWR-1 with the current annualized retail revenues of \$2,067,371,000 presented on page 2 of Exhibit C-2.
  - d. Please reconcile the Company's proposed annualized retail revenues of \$2,322,327,284 presented in Exhibit AWR-1 with the proposed annualized retail revenues of \$2,245,605,000 presented on page 2 of Exhibit C-2.
  - e. Confirm or Deny. Has the Company enacted a rate increase subsequent the test year ending December 31, 2019?
  - f. Please provide the requested documents in electronic form with all spreadsheet links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested

Respectfully submitted this 14<sup>th</sup> day of December 2020,

S.C. DEPARTMENT OF CONSUMER AFFAIRS



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**CERTIFICATE OF SERVICE**

I, Roger Hall, hereby certify that the foregoing document was served by electronic mail on all persons at the addresses listed in the official service list for Docket 2020-125-E on December 14, 2020.

A handwritten signature in blue ink that reads "Roger Hall". The signature is written in a cursive style with a horizontal line extending from the end of the name.

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Roger Hall, Esq.